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8 Attorney for Defendant and Cross-Complainant
9 GERALD ARMSTRONG

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 FOR THE COUNTY OF MARIN

to Benz
5-31-94
aa

12 CHURCH OF SCIENTOLOGY INTERNATIONAL,)
13 a California not-for-profit)
14 religious corporation,)

15 Plaintiff,)

16 vs.)

17 GERALD ARMSTRONG; MICHAEL WALTON;)
18 THE GERALD ARMSTRONG CORPORATION,)
19 a California for-profit)
20 corporation; DOES 1 through 100,)
21 inclusive,)

22 Defendants.)

No. 157 680

NOTICE OF MOTION AND
MOTION TO COMPEL FURTHER
INTERROGATORIES AND FOR
SANCTIONS; POINTS AND
AUTHORITIES; DECLARATION
OF FORD GREENE; SEPARATE
STATEMENT OF FORM
INTERROGATORIES AND
RESPONSES IN DISPUTE

Date: 6/20/94
Time: 2:30 p.m.
Dept: Referee Benz
Trial Date: 9/29/94

23 TO PLAINTIFF AND CROSS-DEFENDANT CHURCH OF SCIENTOLOGY
24 INTERNATIONAL AND TO ITS ATTORNEYS OF RECORD:

25 PLEASE TAKE NOTICE that on June 20, 1994, at 2:30 p.m., or as
26 soon thereafter as the matter may be heard by the discovery
27 referee, William R. Benz located at 900 Larkspur Landing Circle,
28 No. 185, Larkspur, California, Defendant and Cross-Complainant
Gerald Armstrong will seek an Order requiring Scientology to
further respond to the Form Interrogatories that are set forth
more fully in the Statement of Requests and Disputed Responses.
In addition Armstrong seeks an order which awards monetary

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1 sanctions against plaintiff and its attorneys, the law firms of
2 Bowles and Moxon, and Wilson, Ryan and Campolongo and against
3 Laurie J. Bartilson and Andrew Wilson.

4 This motion is brought pursuant to Code of Civil procedure
5 sections 2023, 2030 and 2033.5 and is factually predicated on
6 plaintiff's failure to properly respond to certain Form
7 Interrogatories and Requests for Admission propounded by
8 Armstrong.

9 This motion is based upon the instant Notice, the
10 accompanying Memorandum of Points and Authorities, Statement of
11 Requests and Responses in Dispute, the Declaration of Ford Greene,
12 all such corresponding documents filed in support of Armstrong's
13 motion to compel further responses to his First Set of Requests
14 for Admission, and all the Court's files and records in this case.

15 DATED: May 31, 1994

HUB LAW OFFICES

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By: _____
FORD GREENE
Attorney for Defendant and
Cross-Complainant
GERALD ARMSTRONG

